

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on behalf all others similarly situated,  Plaintiff,  v.  FXCM INC., DROR NIV, and ROBERT LANDE,  Defendants.	No. 1:17-cv-00916 (RA)
YING ZHAO, Individually and on behalf all others similarly situated,  Plaintiff,  v.  FXCM INC., DROR NIV, and ROBERT LANDE,  Defendants.	No. 1:17-cv-00955
DAVID BLINN, Individually and on behalf all others similarly situated,  Plaintiff,  v.  FXCM INC., DROR NIV, and ROBERT LANDE,  Defendants.	No. 1:17-cv-01028
683 CAPITAL PARTNERS, L.P., Individually and on behalf all others similarly situated,  Plaintiff,  v.  GLOBAL BROKERAGE, INC. f/k/a FXCM INC., DROR NIV, and ROBERT LANDE,  Defendants.	No. 1:17-cv-02506

**NOTICE OF MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL  
OF WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP AS LEAD COUNSEL**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that Proposed Lead Plaintiff and putative class member Sergey Regukh (“Movant”), hereby moves this Court, for an Order: **(1)** consolidating the above-captioned actions pursuant to Federal Rules of Civil Procedure R. 42(a); **(2)** appointing Movant as Lead Plaintiff pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4, *et seq.*; and **(3)** approving Movant’s selection of the law firm of Wolf Haldenstein Adler Freeman & Herz LLP to serve as Lead Counsel for the Class pursuant to §21D(a)(3)(B)(v) of the Exchange Act, 15 U.S.C. § 78u-4(a)(3)(B)(v).

This motion is supported by the accompanying Memorandum of Law in Support of Motion for Appointment as Lead Plaintiff and Approval of Wolf Haldenstein Adler Freeman & Herz LLP As Lead Counsel; the Declaration of Matthew M. Guiney in support thereof and the exhibits attached thereto; all of the prior pleadings and proceedings filed herein; and such other written and/or oral argument as may be presented to the Court.

DATED: New York, New York  
April 10, 2017

**WOLF HALDENSTEIN ADLER FREEMAN  
& HERZ LLP**

/s/Matthew M. Guiney

Matthew M. Guiney

Gregory M. Nespole

Kevin G. Cooper

270 Madison Avenue

New York, NY 10016

Tel.: (212) 545-4600

Fax: (212) 545-4653

Email: [Guiney@whafh.com](mailto:Guiney@whafh.com)

[GMN@whafh.com](mailto:GMN@whafh.com)

[KCooper@whafh.com](mailto:KCooper@whafh.com)

*Counsel for Lead Plaintiff Movant  
Sergey Regukh*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of April 10, 2017 at New York, New York.

/s/Matthew M. Guiney

Matthew M. Guiney  
Gregory M. Nespole  
Kevin G. Cooper  
270 Madison Avenue  
New York, NY 10016  
Tel.: (212) 545-4600  
Fax: (212) 545-4653  
Email: [Guiney@whafh.com](mailto:Guiney@whafh.com)  
[GMN@whafh.com](mailto:GMN@whafh.com)  
[KCooper@whafh.com](mailto:KCooper@whafh.com)

*Counsel for Lead Plaintiff Movant  
Sergey Regukh*